



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 West 15<sup>th</sup> St, Suite 3200  
HELENA, MONTANA 59626

Ref: 8MO

October 24, 2007

Mr. Jose Castro, District Ranger  
Bozeman Ranger District  
Gallatin National Forest  
3710 Fallon Street, Suite C  
Bozeman, Montana 59718

Re: CEQ # 20070407; EPA Comments on North  
Bridgers Allotment Management Plan  
Update FEIS and ROD

Dear Mr. Castro:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the North Bridgers Allotment Management Plan (AMP) Update.

The EPA supports the Bozeman Ranger District's selection of Alternative 3 to improve grazing management and practices on Federal allotments in the North Bridger Mountains. The development of updated AMPs for the North Bridger Mountains grazing area should improve water quality and riparian and hydrologic condition and fisheries in project area streams. Although that we have some concerns regarding the availability of funding and resources to carry out necessary grazing and range improvements, and monitoring and grazing oversight, and about the time frame by which water quality and proper functioning condition would be restored.

We note that some streams in the project area are water quality impaired, and listed on Montana's Clean Water Act Section 303(d) list (e.g., Sixteenmile Creek, Smith Creek, South Cottonwood Creek, Dry Creek). We particularly support efforts to improve water quality and restore full support of beneficial uses in water quality impaired streams, and consider such efforts to be consistent with the Forest Service's responsibility for assuring that activities on National Forest land are consistent with the Clean Water Act goal to restore and maintain the chemical, physical and biological integrity of the Nation's waters. We note that the goal of the Montana Water Quality Restoration and Total Maximum Daily Load (TMDL) program is to restore water quality and full support of beneficial uses in water quality impaired waters within 5 years of approval of TMDLs and Water Quality Plans for impaired waters, which are scheduled to be completed in the project area by 2012. It will be important for the updated grazing program to restore water quality and beneficial use support in impaired waters by 2017 (i.e., within 5 years of scheduled TMDL completion date in 2012).

The selected alternative involves implementing an adaptive management program on 11 grazing allotments by an interdisciplinary Adaptive Management Implementation Team that would review monitoring data and oversee grazing management to address grazing effects on stream form and function and riparian health as well as to reduce the spread of noxious weeds. We emphasize the importance of having technical staff representation on the Adaptive Management Implementation Team with appropriate water quality, fisheries and riparian vegetation or riparian ecology expertise.

We also want to thank you for providing responses to EPA's DEIS comments in Appendix 1 in the ROD. We are pleased that streambank trampling standards will be used as the basis upon which cattle will be moved, and that monitoring of spawning success in streams containing westslope cutthroat and Yellowstone cutthroat trout will be carried out. We believe that trampling of trout redds in streams by cattle may be an important factor impacting spawning success. Evaluation of monitoring data on spawning success may evidence that trampling of redds should also be a criterion by which cattle should be moved or otherwise managed with fencing and off-stream watering (i.e., in addition to streambank trampling).

The EPA appreciates the opportunity to review and comment during the NEPA process. If you have any questions please contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at 406-329-3313, or via e-mail at [potts.stephen@epa.gov](mailto:potts.stephen@epa.gov) . Thank you for your consideration.

Sincerely,

/s/ John F. Wardell  
Director  
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver  
Mark Kelley/Robert Ray, MDEQ, Helena